

SMITH & SCHNACKE

A LEGAL PROFESSIONAL ASSOCIATION

2250 THE HUNTINGTON CENTER

41 SOUTH HIGH STREET

COLUMBUS, OHIO 43215-6199

IN DAYTON:

2000 COURTHOUSE PLAZA N E

POST OFFICE BOX 1817 45401

513/226-6500

TELEX: 5106012794

TELECOPIER: 513/226-6635

DAYTON TO COLUMBUS

DIRECT LINE 226-6692

614/224-6500

CABLE "SMITHLAW"

TELECOPIER 614/221-5372

IN CINCINNATI:

2900 DuBOIS TOWER

511 WALNUT STREET 45202-3163

513/352-6500

TELEX: 5106012795

TELECOPIER 513/352-6514

CINCINNATI TO DAYTON

DIRECT LINE 628-0954

June 29, 1987

CONFIDENTIAL BUSINESS INFORMATION

Ruth Mancos
Document Control Officer
U.S. EPA SHE-12
230 South Dearborn Street
Chicago, IL 60604

Re: Information request, Cardington Road Landfill,
Montgomery County, Ohio

Dear Ms. Mancos:

Recently your office directed requests for information under Section 104 of CERCLA and Section 3007 of RCRA to Waste Management, Inc., c/o Industrial Waste Disposal Co. and to Blaylock Trucking Company, Inc., seeking information concerning the Sanitary Landfill Company site on Cardington Road in Montgomery County, Ohio. In response to this request, Waste Management conducted an investigation into its involvement, or that of any of its subsidiaries, with this site. This investigation confirmed that, contrary to the impression contained in the request for information, Industrial Waste Disposal Co., Inc. ("IWD"), never owned, operated, or leased the Cardington Road site. Furthermore, neither Waste Management nor any other of its subsidiaries ever owned, operated or leased this site.

However, Waste Management has learned that three of its subsidiaries, IWD, Blaylock Trucking Company, Inc., and Koogler-Suburban Refuse Removal Company, have hauled material to the Cardington Road landfill. With respect to these three transporters, Waste Management responds to your request for information as follows:

1. To the best of Waste Management's information, and as a result of its investigation, neither Waste Management nor any of its subsidiaries has ever owned, operated or leased the Cardington Road landfill site.

2. Waste Management has no knowledge, after investigation, of any existing shipping or business documents relating to the transportation, storage or disposal of waste at the site. However, Waste Management's investigation remains open should any previously undiscovered documents come to light. If any such documents are discovered they will be forwarded to you immediately.

3. Waste Management cannot provide the detailed description requested because, to the best of its knowledge, no descriptive or supportive documents exist. However, Waste Management has learned from the memory and oral communications of employees that its three previously identified subsidiaries hauled material to the site as follows:

IWD - hauled waste to Cardington Road throughout the 1970's.

Blaylock - hauled residential and light commercial trash to the site in the early 1970's, before the Montgomery County incinerator opened. After that, Blaylock infrequently (only 1-2 twenty yard loads) hauled residential and light commercial trash to the site when the incinerator was down.

Koogler - on infrequent occasions hauled construction and demolition debris to the site.

4. Waste Management does not believe that any of its subsidiaries transported hazardous substances to the site, but Waste Management does not have specific information on what was hauled because, to the best of its knowledge, no supporting documentation exists.

5. To the best of Waste Management's knowledge, Blaylock occasionally transported residential trash to the site in mechanical packer garbage trucks and Koogler occasionally transported construction and demolition debris to the site in roll-off boxes. Waste Management's investigation into the type of transportation used by IWD is not complete. That information will be forthcoming within the next few days.

6. Waste Management does not believe that any of its subsidiaries transported hazardous substances to the site. Furthermore, Waste Management cannot identify the generators of the material which its subsidiaries did haul because, to the best of its knowledge, no supporting documentation exists.

Ruth Mancos
June 29, 1987
Page 3

7. To the best of Waste Management's knowledge, no such documents exist.

8. IWD and Blaylock were covered by the Home Insurance Company, from July, 1975 through July, 1984, and by the Travelers Insurance Companies from July, 1974 through July, 1975. Koogler was covered by Liberty Mutual Insurance Company from June, 1977 through June, 1978 and from June, 1979 through June, 1980. Koogler was also covered by INA from January, 1980 through January, 1982. Waste Management deems this insurance information to be confidential information pursuant to 40 C.F.R. Part 2.

9. Waste Management cannot provide this information because neither Waste Management, nor any of its subsidiaries ever owned, operated or leased the Cardington Road landfill site.

Waste Management reserves the right to supplement this response in the event that any additional responsive information or documentation should be discovered.

Very truly yours,



John W. Edwards

JWE:vls
cc: Deborah Garber